Initial Environmental Examination (IEE)
for
Fiscal Year 2016 Request for Applications (RFA) Title II Development Food Assistance Projects for Democratic Republic of Congo, Ethiopia, and Liberia

Activity/Project Title: Initial Environmental Examination (IEE) USAID Food for Peace FY16 Request for Applications (RFA) for Development Food Assistance Projects	
RFA #: CFDA Number: 98.007, Link: FY16 Request for Applications (RFA),	
Contract/Award Name(s) & Number(s) (if known): To be determined upon award(s)	
Geographic Location (Country(ies)/ Region/Global): Democratic Republic of Congo, Ethiopia, and Liberia	
Operating Unit(s): Office of Food for Peace (FFP), Bureau for Democracy, Conflict and Humanitarian Assistance (DCHA), DCHA/FFP	
☐ Amendment ☐ Supplemental IEE	**DCN and date of Office-Level IEE**: DCHA_FFP_FY16 RFA IEE
	IEE Link: http://gemini.info.usaid.gov/egat/envcomp/document.php?doc_id=45761
	Amendment No.: N/A
Funding Amount: Refer to FFP Country Specific Information, $150M (DRC), $550M (Ethiopia), $66M (Liberia) over 5 years	
IEE Prepared By: Global Environmental Management Support Contract (GEMS)	**IEE Date Prepared**: April 2016
Implementing Partner(s): To be determined upon award(s)	
Recommended Threshold Determination: ☐ Categorical Exclusion ☒ Negative Determination ☒ With Conditions	☐ Positive Determination ☒ Deferral

SUMMARY OF FINDINGS:

The purpose of this Food for Peace (FFP) Request for Application (RFA) Initial Environmental Examination ("RFA IEE") is to establish environmental compliance policies and procedures for the FY 16 FFP development food assistance projects in The *Democratic Republic of Congo, Ethiopia and Liberia*, as described in section IV of the FFP FY16 RFA. Environmental compliance will be met through both: 1) this pre-award RFA IEE, and 2) post-award supplemental "Project IEEs" that describe potential environmental risks and impacts pertaining to the specific baseline and activities of the awarded project.

ENVIRONMENTAL THRESHOLD DETERMINATIONS:

A **Negative Determination with Conditions**, pursuant to 22 CFR 216.3(a)(2)(iii), is recommended for all commodity fumigation activities.

A **Deferral is** recommended for all other project activities pursuant to 22 CFR 216.3(a)(7)(iv) for activities that are not yet well defined in scope or technical approach. Project IEEs will need to be developed once USAID makes apparent its intention to fund a project proposal. Project IEEs will analyze potential impacts of all activities and resolve all applicable Deferrals recommended in this RFA IEE.

CONDITIONS:

At the Pre-Award, Proposal Stage:

Condition 1: Develop Environmental Safeguards Plan: The environmental safeguards plan describes how the project will mitigate foreseeable environmental impacts of program activities and improve the management of ecological goods and services in the region of the country where programming is proposed (See FFP FY 16 RFA for Development Food Assistance Projects in the DRC, Ethiopia and Liberia).[1]

Condition 2: Plan for budget and staffing: Provide detailed budget items and narrative description for the cost of implementing the Environmental Safeguards Plan, which includes elements for carrying out the Project IEE.

At the Post-Award, Project IEE Stage:

Condition 3: Develop Project IEE and EMMP: Successful applicants will submit the project IEE and EMMP within 60 days following the M&E workshop. Project IEEs will resolve all applicable Deferrals recommended in this RFA IEE.

Condition 4: **Integrate environmental considerations into M&E systems**: Integration of climate and environmental safeguard sensitivities into the Theory of Change, Log Frame and IPTT.

Condition 5: Review and update environmental safeguards budget: Based upon the project IEE findings, as well as the mitigation and monitoring tasks detailed in the EMMP, ensure resources are committed to the implementation of all environmental compliance and safeguards components. See the USAID Environmental Budgeting Toolkit for guidance.

Condition 6: Plan for a Pesticide Evaluation Report and Safe Use Action Plan (PERSUAP). Pursuant to 22 CFR 216.3(b), approval from the DCHA/BEO is required under the guidance of a PERSUAP prior to the promotion, procurement, transport, storage or disposal of any pesticides utilized for agricultural, livestock, health vector control and construction material treatment activities, as well as for commodity fumigation activities (see USAID "Fumigation PEA" and Fumigation Management Plan (FMP) Template).

Condition 7: Monitor and report on USAID environmental compliance: All FFP projects are required to produce *Environmental Status Reports* (ESRs) once a year (Refer to Annex 4 for ESR Template).

Condition 8: Ensure FFP project compliance with partner country regulations: Implementation will in all cases adhere to applicable partner country environmental laws.

[1] See section entitled: "Climate Change, Environmental Safeguards and Compliance," under SECTION IV – APPLICATION AND SUBMISSION INFORMATION, 2) application format, c) project description.

USAID APPROVAL OF ENVIRONMENTAL ACTION(S):

Clearance:

FFP Director: /cleared by email/ Date: May, 2, 2016

Matt Nims, Acting

FFP Grants Manager: /cleared by email/ Date: May, 2, 2016

Juli Majernik

Concurrence:

DCHA Bureau Environmental Officer (BEO): Erika J. Clesceri Date: June 6, 2016

Erika J. Clesceri

CC to:

Africa Bureau Environmental Officer (BEO)

East Africa Regional Environmental Adviser (REA)

Sahel Regional Africa Regional Environmental Officer (REO)

West Africa Regional Environmental Adviser (REA)

All USAID environmental assessment documents are accessible on the USAID Environmental Compliance Database.

Table of Contents

1.0 Background and Activity Description

1.1 Purpose and Scope of IEE

Recent international development agency guidelines, including the USAID/Democracy, Conflict and Humanitarian Assistance (DCHA) Technical References for FFP Development Food Assistance Programs, stress the importance of coordinated assessment and integration of climate change resilience, disaster risk reduction (DRR) and environmental management and safeguards in development programming. Furthermore, the Foreign Assistance Act of 1961, Section 117, requires that the impact of USAID's activities on the environment be considered and that USAID include environmental sustainability as a central consideration in designing and carrying out its development objectives over the life of the project. This mandate is codified in Federal Regulations (22 CFR 216) and the USAID's Automated Directives System (ADS) Part 204.

In addition, in 2014, President Obama signed Executive Order (EO) 13677 on Climate Resilient International Development. This Executive Order requires that agencies with international development programs must now systematically incorporate climate-resilience considerations into international development strategies, planning, programming, investments, and related funding decisions. In light of the Executive Order 13677, applicants must provide increased attention to addressing climate vulnerability and resilience in the geographic areas where FFP projects will operate.

This RFA IEE serves as a pre-award, environmental-threshold decision document for USAID environmental regulations, which describes how the project will address the following climate and environmental limiting factors that challenge the effectiveness of food security goals and objectives:

1. How can the project avoid causing detrimental impacts to the local environment of land, water and flora/fauna, including humans (e.g., project-related deforestation, medical waste management, safe/effective pesticide use, water quality assurance)?
2. How can the project plan to improve community resilience to environmental degradation and climate-related shocks (e.g., potable water quality and supply, water shortages and drought, road durability/erosion, vector control)?
3. How can the project plan to rehabilitate degraded natural resources that are relevant to project's food security objectives (e.g., poor soil fertility, diminished fish stocks, contaminated drinking water)?
4. How can the project strengthen knowledge, change attitudes, and galvanize action among target beneficiaries to better manage communal natural resources?

1.2 Background

The Office of Food for Peace (FFP), in the U.S. Agency for International Development's (USAID's) Bureau for Democracy, Conflict, and Humanitarian Assistance (DCHA), supports non-emergency food assistance programs designed to improve food access and incomes through agriculture and other livelihoods initiatives; enhance natural resource and environmental management; combat under nutrition, especially for children under two and pregnant and lactating women; and mitigate disaster impact through early warning and community preparedness activities.

It is anticipated that the FY16 FFP development food assistance projects in The Democratic Republic of the Congo, Ethiopia, and Liberia will be carried out in multiple rural ecosystems and areas that are beset by poverty, years of poor environmental governance, and climate shocks.

1.3 Description of Project Activities

FFP development food assistance projects are intended to build resilience in populations vulnerable to chronic hunger and repeated hunger crises, and to reduce their future need for ongoing or emergency food assistance. To these ends, the FFP office supports the procurement, protection and distribution of agricultural food commodity (Activity Type 1), as well as a range of program elements (Activity Type 2).

Activity Type 1: Food commodity protection, productive industry, vector control and construction activities involving the promotion, procurement or use of pesticides.

The FFP Office makes agricultural commodity donations to private voluntary organizations (PVOs) and international organizations (IOs), such as the UN's World Food Program (WFP). The large majority of FFP commodities are purchased from US farmers and shipped abroad from US ports, however programs can also distribute locally/regionally procured (LRP) food commodity as long as the use of LRP clearly supports interventions that sustainably reduce vulnerability to food insecurity (See RFA, Section I.3).

In order to prevent the spoilage and wasting of agricultural food commodity procured by development food assistance projects, a range of protective measures are implemented in commodity storage warehouses. One common protective measure to prevent loss of commodity from insect, fungal or mammal infestations is warehouse fumigation utilizing phosphine gas and/or the application of contact pesticides to warehouse surfaces.

In addition, development food assistance projects may procure and promote the use of chemical, biological and botanical-based pesticides to combat crop maladies, control disease vector populations, or treat construction materials to prevent infestation and degradation of material quality over time.

Activity Type 2: FFP Program Elements (see Annex 1 of the RFA)

The program elements, which describe the general focus of activities to be supported within development food assistance projects, are defined below:

1. *Agriculture Sector Capacity:* Reduce risks during the agricultural production cycle and increase agricultural productivity by encouraging activities related to a sustainable agriculture system.
2. *Strengthen Microenterprise Productivity:* Support the start-up and expansion of self-employment and micro and small enterprises owned and operated by low-income people.
3. *Natural Resources and Biodiversity:* Promote natural resource management and conserve biodiversity in a socially, economically, and environmentally sustainable manner while working to maximize return and predictability of income.
4. *Civic Participation:* Increase communities' capacity to influence the factors that affect their food security, and strengthen the financial, management, and administrative capacity of the community and implementing partner organizations.
5. *HIV/AIDS:* Reduce the transmission and impact of HIV/AIDS through support for prevention, care and treatment programs.
6. *Maternal and Child Health:* Increase the availability and use of proven life-saving interventions that address the major killers of mothers and children and improve their health status.
7. *Family Planning and Reproductive Health:* Expand access to high-quality voluntary family planning services and information, and reproductive health care.
8. *Water Supply and Sanitation:* Improve water and sanitation infrastructure, and resource management practices.
9. *Nutrition:* Increase the availability and use of proven nutrition interventions to reduce mortality, morbidity, and food insecurity.
10. *Basic Education:* Improve early childhood education, primary education, and secondary education, delivered in formal or non-formal settings.
11. *Social Assistance:* Provide cash or in-kind transfers to the poor or those suffering from temporary shocks.
12. *Protection and Solutions:* Ensure full respect for the rights of the individual and communities in accordance with the letter and the spirit of the relevant bodies of law (international humanitarian, human rights, and refugee law).
13. *Capacity Building Preparedness and Planning:* Assist communities with efforts to reduce potential damage from natural hazards such as earthquakes, floods, landslides, droughts, and cyclones.
14. *Assistance and Recovery:* Promote rapid and durable recovery in the aftermath of a disaster by supporting livelihoods, markets, and the sustainable provision of basic services.
15. *Clean Productive Environment:* Reduce health risks associated with environmental pollution (e.g. due to agriculture or other human activity).
16. *Inclusive Financial Markets:* Support equitable access to essential financial services of diverse providers to low-income families and female and male-owned micro-scale enterprises/activities.

2.0 Country and Environmental Information

2.1 Locations Affected

The project design that applicants submit in their proposals will address intervention area-specific biophysical, socio-economic and cultural conditions, as well as the political and institutional context in which the development food assistance project will operate. Applicants are expected to draw from existing USAID or other country-level environmental analyses, including Environmental Threat and Opportunity Analyses (ETOAs), Climate Change Vulnerability and Adaptation Analyses, FAA 118/119 Analyses, and Country Specific Information reports.

Liberia

Environmental Threat and Opportunities or Tropical Forest and Biodiversity (118/119)
As discussed in the Liberia FAA 118/119 Analysis (2014), despite its remarkable expansion over the last five years, Liberia's agricultural sector has faced increasing challenges in recent years stemming principally from land disputes and the effects of climate change. Land disputes have become a particular problem between oil palm companies and rural communities, as disagreements regarding land tenure and boundary divisions have remained unresolved. Based upon the best available data and modeling, conservation management and land-use planning are necessary to ensure the sustainable development of industrial agricultural sector.

However, the expansion of the industrial agricultural frontier has driven deforestation and fragmentation of natural habitats. Additionally, forests, wetlands and productive grazing and agricultural areas have been affected by invasive species in recent decades (e.g. *Eichhornia* spp., *Leucenea leucocephalus* and *Chromoleana odorata)* generating several ecological and economic impacts. Although the exact scope of this threat has not yet been specifically defined, invasive species can create long-term modifications in ecosystem functions, contribute to a loss in biodiversity, and negatively impact several resource and land management-based livelihoods.

Climate Vulnerability
With regards to the impacts of climate change on agricultural lands, production and livelihoods, according to The USAID Liberia Climate Change Assessment (Stanturff et al., 2013), interior counties, particularly Bong, are likely to be negatively affected by increasing average temperatures and changes in rainfall patterns. Stanturff et al. (2013) employed a suite of statistically downscaled climate models and indices to determine the levels of vulnerability of productive, social and ecological systems to projected changes in climate in different regions in Liberia. According to the study, certain areas of interior Liberia will likely experience an increase in average precipitation and heavy rainfall events, which may increase the risk of floods that erode and inundate agricultural land surfaces thereby degrading soil quality. The study includes valuable information on climate vulnerabilities in the target FFP counties of Bong, Grand Bassa and River Cess. The USAID Climate Change Adaptation in Liberia Fact Sheet (2012) provides strategic guidance on the importance of considering climate adaptation measures in agricultural development. These two resources will be critical to consider when designing the program

environmental safeguard plan, project IEE, and when integrating climate change resilience into program design.

PERSUAP and Pesticides

PERSUAPs have been developed to approve the safe use of specific pesticides in Liberia and to provide guidance on integrated pest management for a variety of crops. These PERSUAPs could potentially be utilized by a FFP project. Coordinate with the Mission prior to the development of any PERSUAP for agricultural or livestock activities, vector control interventions or construction material treatments that will procure or promote the use of pesticides. To view an example of a Fumigation PERSUAP developed for agricultural commodity protection in Liberia, reference the USAID/Liberia FFP HANDS PERSUAP.

Refine and Implement

Liberia is part of the Refine and Implement pilot (see Annex II of the RFA for more information). This pilot program allows awardees to more closely assess the operating environment for the development food assistance project during the first year of implementation, and adjust program design and implementation considerations in response to changing or unanticipated situations on the ground. Part of the R&I process includes environmental and climate change analysis.

USAID Mission Contacts

Liberia's Mission Environmental Officer*: Solomon Page, spage@usaid.gov
Liberia's Regional Environmental Advisor: Henry Aryeetey haryeetey@usaid.gov
*The Mission is anticipating a new MEO.

Democratic Republic of the Congo

Environmental Threat and Opportunities or Tropical Forest and Biodiversity (118/119)

As discussed in the FAA 118/119 Analysis (2010), the Democratic Republic of the Congo (DRC) faces particularly pressing environmental challenges stemming from forest degradation and deforestation, loss of biodiversity, and climate change impacts. All of these factors should be appropriately considered with respect to the project's initial environmental examination.

In the DRC's Occidental, Tanganyika, and Oriental areas, the expansion of the agriculture frontier, livestock grazing, hunting, and fuel wood harvesting are the principal drivers of deforestation and biodiversity loss. While in the Kivu area, several protected areas have been compromised due to agriculture related activities and rapid population growth in rural areas. Protected areas throughout the DRC face threats from human activities in the form of habitat encroachment and degradation, human settlements, and illegal logging and mining.

Climate Vulnerability

Although climate change models have not yet fully been applied to the DRC context, climate change poses a threat to biodiversity and socio-economic systems. Further geographic downscaling of data is required to determine how climate change may be expected to influence regional climate, natural resources, and biodiversity in the DRC in order to generate targeted climate change adaptation strategies. Climate change is also anticipated to impact the food security and livelihoods of the poor majority (particularly women). According to the DRC FA 118/119 analysis, these sectors of the population are, "highly dependent on climate-sensitive sectors like agriculture, fisheries, pastoral practices, and forests for household energy, food, water supply, herbs, and tree barks..." These are a few important environmental and social aspects to consider when designing the program environmental safeguard plan, project IEE, and when integrating climate change resilience measures into program design. For more DRC-specific information, please refer to the USAID Democratic Republic of the Congo Climate Vulnerability Profile and the Netherlands Commission for Environmental Assessment's Report on Climate Change Profile for the Democratic Republic of the Congo.

PERSUAP and Pesticides

The DRC Mission is developing a Mission-wide Agriculture PERSUAP, which will cover activities in the DRC under the agriculture, stabilization, and Food for Peace programs, as well as livelihoods/agriculture activities under CARPE in the DRC. Coordinate with the Mission prior to the development of any PERSUAP for agricultural or livestock activities, vector control interventions or construction material treatments that will procure or promote the use of pesticides. To view and example of a fumigation PERSUAP developed for commodity protection in the DRC, reference the USAID/DRC FFP JENGA II PERSUAP.

Relevant Assessments

An Environmental Assessment for Irrigation was approved in DRC (2013) and may be a helpful resource for future project.

Refine and Implement

The DRC is part of the Refine and Implement pilot (see Annex II of the RFA for more information). This pilot program allows awardees to more closely assess the operating environment for the development food assistance project during the first year of implementation, and adjust program design and implementation considerations in response to changing or unanticipated situations on the ground. Part of the R&I process includes environmental and climate change analysis.

USAID Mission Contacts

DRC's Mission Environmental Officer: Kimberly Thompson kthompson@usaid.gov
East Africa Regional Environmental Advisor: David Kinyua dkinyua@usaid.gov

Ethiopia

Environmental Threat and Opportunities or Tropical Forest and Biodiversity (118/119)

As discussed in the FAA 118/119 Analysis (2008), Ethiopia experiences environmental degradation resulting primarily from the expansion of industrial agriculture and pastoralism. In the pastoralist regions, livestock overgrazing is one of the primary drivers of land degradation, which has caused excessive erosion and siltation of water sources. Agricultural activities, which make up almost half of Ethiopia's gross domestic production, pose a variety of threats to Ethiopia's environmental and biological resources, including: draining of wetland habitats for irrigation, encroachment upon protected areas, increased deforestation for agricultural development, etc. In regions, such as Oromia, agricultural expansion, livestock overstocking, unsustainable fuel wood harvesting and usage, and invasive species all threaten the long-term sustainability of socio-economic development initiatives. Forest resources are at risk from population growth, rudimentary farming approaches, land use competition, fires, agriculture, fuel wood harvesting without adequate forestry management etc. USAID programs have sought to assist in decreasing the prevalence of low-yield extensive agriculture and herding that is highly dependent on limited natural resources.

A new FAA 118/119 Analysis for Ethiopia should be available in 2016.

Climate Vulnerability

Rural livelihood systems in Ethiopia, which include agriculture and pastoralism, are greatly sensitive to climate change. Changes in rainfall patterns contribute to negative effects on food security as cultivators have less and less ability to plan appropriately for their crops. These changes also highlight the climate vulnerability of crop cultivators. As rainfall patterns become less predictable, pastoralists also face the challenge of finding the necessary fodder and water for their livestock. Climate variability is an important aspect of environmental examinations.

USAID has sought to provide additional guidance to the Food for Peace (FFP) program in Ethiopia through a technical report entitled, "Climate Variability and Change in Ethiopia." As an additional resource, the World Bank commissioned an assessment of the "Economics of Adaptation to Climate Change" for Ethiopia.

PERSUAP and Pesticides

PERSUAPs have been developed to approve the safe use of specific pesticides in Ethiopia and to provide guidance on integrated pest management for a variety of crops. These PERSUAPs could potentially be utilized by a FFP project. Coordinate with the Mission prior to the development of any PERSUAP for agricultural or livestock activities, vector control interventions or construction material treatments that will procure or promote the use of pesticides. To view and example of a fumigation PERSUAP developed for commodity protection in Ethiopia, reference the USAID/Ethiopia FFP Productive Safety Net Program (PSNP) PERSUAP.

Relevant Assessments

An Environmental Assessment for Irrigation is currently underway in Ethiopia and may be a helpful resource for future projects. As an additional resource, a Programmatic Environmental Assessment on roads for several projects in Ethiopia was approved in 2013. Additionally, a Programmatic Environmental Assessment for Small Scale Irrigation is currently being drafted.

USAID Mission Contacts
Ethiopia's Mission Environmental Officer: Yitayew Abebe yabebe@usaid.gov
Regional Environmental Advisor: David Kinyua, dkinyua@usaid.gov

2.2 Partner Country National Environmental Policies and Procedures

All FFP projects must comply with partner country environmental statutes and USAID policy ADS 204. Project IEEs will include descriptions of all relevant environmental policies and procedures. The IEE supports and strengthens the rule of law for systems of environmental governance in partner countries. For reference, applicants preparing their Project IEEs are encouraged to source partner country environmental policy and regulatory framework information from past IEEs that are publicly available at the USAID Environmental Compliance Database and other existing multilateral donor or country assessments and reports, e.g. UNEP Environmental Profiles, Country Reports to the UN Convention on Biological Diversity, UNFCCC National Adaptation Programs of Action to Climate Change, etc.

3.0 Evaluation of Project Issues with Respect to Environmental Impact Potential

Activity Type 1: Food commodity protection, productive industry, vector control and construction activities involving the promotion, procurement or use of pesticides.

Most FFP projects will carry out the storage and protection of agricultural commodity, either as FFP food aid or as locally-procured food commodity. To prevent the loss of food commodity from pest infestations during storage, it is common practice to perform periodic fumigation of warehouses and/or the application of contact pesticides to warehouse surfaces.

As mentioned in the Fumigation PEA, certain impacts of commodity fumigation must be considered, including:

- Use of the fumigant aluminum phosphide, and to a lesser extent magnesium phosphide, can potentially affect the health of applicators and other on-site workers and visitors.
- Use of the fumigant phosphine gas can affect the health of residents near warehouses being fumigated.
- The quality of the food commodity may be compromised due to phosphine fumigation.
- Beneficiary populations may be at risk from inhalation, preparation, and ingestion of fumigated commodities.
- Phosphine fumigation residuals could affect water quality, soil, and non-target organisms.

- Poor practices in transport, storage, and disposal of fumigants are a concern for human health.
- Improper disposal practices of rodents and birds killed by phosphine gas could affect human health.
- Phosphine may not completely control fungal contamination.

In addition, it is a USAID agency-level policy commitment that projects consider the procurement or promotion of pesticides as a last resort within an Integrated Pest Management (IPM) framework for all activities supporting productive systems, public health interventions, or construction material treatment (see USAID Special Topic Presentation on Pesticides). Whichever their intended use may be, pesticides are potent killing agents and their use poses intrinsic dangers to applicators, households, communities and the environment. These risks include, but are not limited to:

- Use of chemical, non-organic compound-based, and biological or botanical-based pesticides can potentially affect the health of applicators and other on-site workers and visitors.
- Poor practices in the transport, storage, and disposal of pesticides and pesticide containers are a concern for human and environmental health.
- Pesticides can negatively affect and/or eliminate non-target organisms in the environment, (i.e. predator insects and pollinators, micro-organisms beneficial to soil health, aquatic organisms, etc.) thereby altering ecological food webs and potentially causing detriment to agricultural production systems.
- Chemical pesticides can contaminate surface and groundwater water, soils, and can bio accumulate in surrounding ecosystems and organisms, posing a concern for human health.
- Misuse or over-use of pesticides can generate pesticide-resistant crop maladies.

Activity Type 2: FFP Program Elements (see Annex I of the RFA)

This RFA IEE cannot determine the reasonably foreseeable potential environmental impacts of activities occurring within the FFP Program Elements described in section 1.3, as the scope and technical approach of these activities have not yet been defined.

4.0 Recommended Mitigation Actions (Including Monitoring and Evaluation)

4.1 Recommended IEE Determinations

A **Negative Determination with Conditions**, pursuant to 22 CFR 216.3(a)(2)(iii), is recommended for all commodity fumigation activities.

A **Deferral is** recommended for all other project activities that are not yet well defined in scope or technical approach pursuant to 22 CFR 216.3(a)(7)(iv). The **Deferral** for these activities, or FFP Program Elements, must be resolved in the post-award Project IEE, in which each project activity will be assigned a threshold determination: **Categorical Exclusion**, **Negative Determination with Conditions** or **Positive Determination**.

4.2 Mitigation, Monitoring and Evaluation

For RFA applicants, USAID FFP environmental compliance at the time of project design will be met through adherence to both 1) this RFA IEE and 2) completion of a stand-alone, Project IEE, only upon USAID's indication of an intent to award. Once the Project IEE, including the Environmental Mitigation and Monitoring Plan (EMMP) and attendant budget, is finalized and approved by the DCHA BEO, the IEE is to be used to guide project implementation. All mitigation measures contained in the Project IEE must be implemented and monitored for effectiveness in reducing the severity of potential environmental impacts resulting from project activities.

The following 8 conditions describe awardees' environmental compliance, mitigation, monitoring and evaluation responsibilities throughout the LOA of the development food assistance project.

Table of Contents for the Environmental Procedures at the Project Level:

Condition 1: Develop Environmental Safeguards Plan

Environmental Safeguards Plan: Applicants must submit an Environmental Safeguards Plan as part of their FY 16 FFP RFA proposal. Environmental Safeguards are defined as components of a program that are developed as part of the activities' design to mitigate potentially foreseeable negative environmental impacts of program activities, maintain ecological goods and services, and promote their sustainable management by community stakeholders.

As per USAID requirements explained in the RFA, applicants are expected to integrate environmental safeguards and climate change sensitivities throughout their project narrative. As part of this integration, applicants must include a description of their plans for completing a Project IEE as an annex entitled the Environmental Safeguards Plan. This plan is a high-level summary of the strategic integration of climate and environmental safeguards into project design, and may be no more than four pages in length.

This safeguards plan, developed by the applicant, must address four key components:

1. how environmental safeguards and climate change sensitivities have been integrated[2];
2. how environmental stand-alone/specific and integration/sensitive indicators have been included in M&E systems (See Condition 4),
3. how funds have been allocated in the detailed/comprehensive budgets and described in the budget narrative, and
4. the strategy for future development of the Project IEE.

This plan will be reviewed by the DCHA BEO and the BEO's comments will be integrated into the Issues Letters.

For more information and guidance on the environmental safeguards plan, see Section II.G Environmental Safeguards and Compliance of the Technical References for FFP Development Food Assistance Programs.

Condition 2: Plan for budget and staffing

Environmental Budgeting: FFP requires that all projects have the necessary budget to achieve environmental compliance (as per ADS Chapter 204.2.c). As with budgeting for any project costs, a degree of budget planning must logically occur at the initial proposal development stage, and more detailed budgeting must also occur during the development of the Project IEE to identify EMMP implementation costs. Additional environmental budgeting items that were not integrated into the initial proposal's budget, which are identified during the subsequent development of the Project IEE, **must be added prior to the signing of the final award**. The DCHA/BEO will have the opportunity to review project budget for environmental compliance cost elements.

Box 1. Common Materials and Services Needed for Environmental Requirements in FFP Projects

- Staffing for implementing environmental safeguards, conducting trainings and community outreach, conducting environmental monitoring visits, etc.
- Fumigation services.
- Environmental assessments for roads, irrigation, etc.
- Community environmental training, such as on fuel-efficient cooking practices.
- Mitigation and monitoring measures, such as water quality testing.
- Travel and transport for environmental monitoring.
- Equipment needed to meet environmental requirements.

For assistance in developing a budget for environmental compliance and management tasks within a development program, USAID has developed an Environmental Compliance Budgeting Toolkit. This toolkit has sections to assist both budget developers and selection committee members who review proposal budgets.

[2] This should address linkages between environmental sensitivities and safeguards in each technical area. Examples include describing how current participant cooking practices can be cleaner, labor-saving and more sustainable to provide positive health, social and environmental impacts.

Condition 3: Develop Project IEE and EMMP

3A. Project Initial Environmental Examination (IEE):

Upon receipt of the FFP award, implementing partners will be required to develop a Project IEE to provide environmental impact analysis for all project activities. In short, the Project IEE must 1) sufficiently describe the technical design of all project activities, 2) identify all reasonably foreseeable environmental impacts of project activities, and 3) recommend sound mitigation measures to prevent, reduce or compensate for environmental impacts. There are a number of important resources that partners can consult to assist in the development of Project IEEs.

- For a general introduction and guidance on how to develop a Project IEE, consult the USAID IEE Assistant.
- Partners are advised to consult previous FFP Project IEEs to research common environmental concerns and solutions among FFP programs globally. Partners can utilize the public USAID Environmental Compliance Database to search for USAID-approved IEEs.
- For technical guidance on environmentally sound design and management for USAID development activities, consult the USAID Sector Environmental Guidelines.
- The USAID Global Environmental Management Support (GEMS) website contains detailed guidance and best-practice considerations for the development of the EMMP.
- The USAID Environmental Compliance Budgeting Toolkit provides guidance on how to identify costs for environmental management tasks described in the Project IEE and EMMP.
- To consider the risks and opportunities that climate change poses to project activities, partners can utilize the USAID agency-wide activity-level Climate Risk Management Table (see **ANNEX 3ANNEX 3ANNEX 3ANNEX 3**).

As summarized in Figure 1, the RFA IEE will be supplemented with the Project IEE.

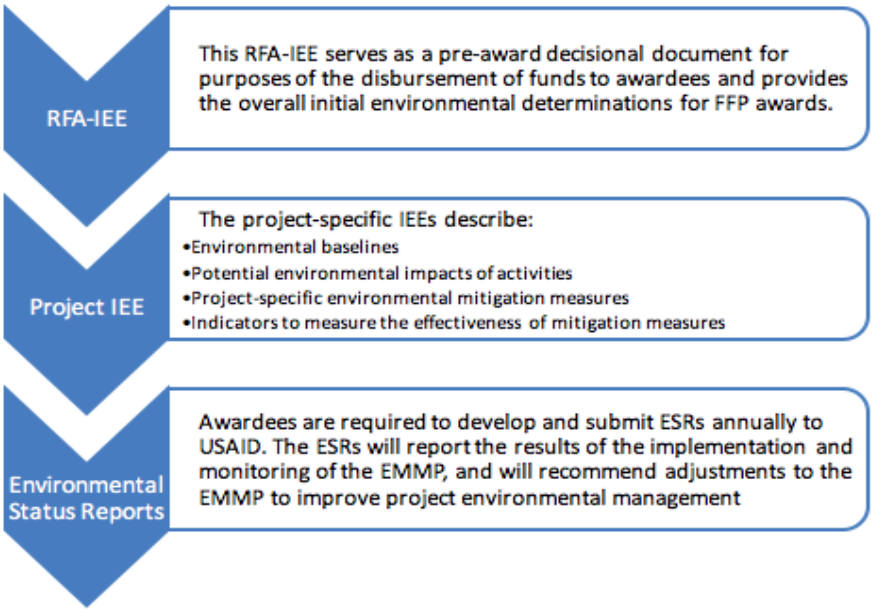

Figure 1: USAID FFP environmental compliance process.

Timing: The Project IEE, including its EMMP, should be used as an analytic tool during the M&E Workshop held during the start-up phase of new development food assistance project (See Condition 4). For this reason, awardees should follow the following scheme for the development of the Project IEE.

- First draft of Project IEE must be developed in advance of the M&E Workshop.
- Update Project IEE according to changes made during the M&E workshop to the ToC, LogFrame, IPTT or other technical design specifications.
- Submission of the final Project IEE to USAID within 60 days after the M&E workshop.
- Project IEE must be approved by the USAID DCHA Bureau Environmental Officer (BEO) prior to the implementation of medium-risk field activities (i.e., classified as a Negative Determination with Conditions as per 22 CFR 216) (See Annex I).

For *Refine and Implement* projects (See RFA Annex II), awardees will attend the M&E Workshop organized by FFP during months seven to twelve of the refinement year. Within 60 days after the workshop, awardees must complete and submit the comprehensive M&E Plan for the project and the final Project IEE.

Considerations for Positive Determinations: A **Positive Determination**, pursuant to 22 CFR 216.3(a)(2)(iii), may arise if an activity determined as a **Deferral** by this RFA IEE is later identified as having the potential to cause significant environmental impacts. Activities that receive a **Positive Determination** will require further environmental analysis such as a Scoping Statement and Environmental Assessment (EA). Typical FFP activities that have triggered a **Positive Determination** in the past include road rehabilitation/construction, large-scale irrigation works, and infrastructure or other agricultural/natural resource-based activities that promote land-use change within or bordering protected areas, ecologically sensitive zones, or habitat for threatened and endangered species.

Infrastructure and Public Works

FFP supports a wide variety of community asset, public works and infrastructure rehabilitation and construction projects within the development food assistance project framework, often complimented by Food for Work or Cash for Work arrangements with program beneficiaries. Infrastructure activities may include, but are not limited to, the construction/rehabilitation of rural and market feeder roads, health clinics, irrigation systems including impoundments, dikes, storage ponds and canals, post-harvest collection and processing centers, community water and sanitation infrastructure, community centers and schools. Depending upon the scale and geographic context in which these activities are implemented, they have the potential to cause significant environmental impacts, including:

- Increased pressure on limited resources resulting from in-migration of people to particular areas with improved infrastructure (roads, schools, health clinics, etc.);
- Localized erosion leading to sedimentation of water bodies and secondary effects upon freshwater ecological systems;
- Creation of disease vector breeding sites and other safety hazards from improperly rehabilitated quarries and borrow pits;
- Compaction of soil on construction sites can prevent water infiltration in soils, generate localized

flooding hazards, and alter natural drainage flows impacting ecosystems and wildlife.

Encroachment on Protected Areas

When infrastructure activities are implemented within or bordering protected areas or other ecologically sensitive areas that provide habitat to endangered or threatened species (e.g. wetlands, primary forests, mangroves) an Environmental Assessment (EA) may be warranted as per 22 CFR 216.5.

Poorly planned infrastructure projects within or bordering protected areas can disrupt hydrological regimes, generate erosion and siltation of water bodies, increase unsustainable wildlife hunting and trade of endangered species, promote the localized land-use change causing deforestation and pollution, and degrade the environmental goods and services that protected areas provide, including:

- Spawning grounds for fisheries;
- Habitat for bush meat and wild relatives of crops;
- Clean fresh water;
- New and traditional medicines;
- Homes, jobs and livelihoods for millions of people;
- Climate change mitigation through Carbon capture and storage;
- Recreational spaces and tourism attractions, and
- Risk mitigation for extreme weather events including floods, storm-surges and droughts.

3B. Environmental Mitigation and Monitoring Plan (EMMP):

As an annex to all Project IEEs, FFP applicants must complete an EMMP which serves as the implementation and monitoring plan for all required 22 CFR 216 compliance actions to be taken by a given project. There are a number of acceptable formats for a project EMMP. This RFA-IEE suggests one template option for the EMMP in Annex 2. Detailed guidance and best-practice considerations for the development of the EMMP is available on the USAID Global Environmental Management Support (GEMS) website and in the Environmental Mitigation and Monitoring Plan Factsheet. The effectiveness of the individual compliance actions (mitigation measures) to prevent or reduce environmental impacts must be monitored periodically throughout the life of the project. The results of this monitoring should be described in the annual Environmental Status Report (ESR) (See Condition 7).

The Environmental Threshold Decision (ETD): The ETD is a short decisional memo appended to the front of each submitted IEE, ESR, PERSUAP and EA that indicates final BEO approval of the given compliance documentation, and describes any required conditions that must be met by the implementing partner. Upon approval and attachment of the ETD, all environmental compliance documentation is subsequently shared with the implementing partner and uploaded to the publically accessible Environmental Compliance Database.

Condition 4: Integrate climate and environmental considerations into M&E Systems

A key component of environmental safeguards for USAID projects is to ensure the integration of climate change and environmental considerations into project performance monitoring systems. The Monitoring and Evaluation (M&E) workshops held at the start-up of new FFP development food assistance projects, are designed to convey M&E requirements and to strengthen awardees' LogFrames and Indicator Performance Tracking Tables (IPTTs). During these workshops, awardees have an initial opportunity to work with M&E experts to identify how to capture environmental and climate change components in project M&E Systems.

Environment Specific vs. Sensitive Indicators: There are various interventions for which environment-specific USAID/FFP indicators already exist (i.e., for climate change resilience, sustainable agriculture, natural resource management). There are also many FFP-supported activities **which rely on environmental resources and/or pose a potential risk to cause unintentional, negative environmental impacts** (i.e. road rehabilitation, construction of potable water sources or irrigation systems), which must be implemented in accordance with the approved Project EMMP. For these types of activities, awardees must ensure relevant IPTT indicators are environmentally sensitive.

To do this, awardees should **Cross-Walk** IPTT indicators with the approved project EMMP, in order to identify how to contextualize IPTT indicators to local conditions and to integrate environmental considerations into performance monitoring. **The purpose of Cross-Walking** is to ensure that IPTT indicators measure the quality of actions related to good environmental stewardship and prevention of potential negative environmental impacts. An assumption of the Cross-Walking process is that a Project EMMP developed by the awardee has been approved by USAID.

How to Cross-Walk the IPTT with the EMMP: To cross-walk an IPTT indicator with the EMMP, awardees should list the potential negative environmental impacts associated with each environmentally sensitive IPTT indicator, and the corresponding mitigation measures that will accompany each activity as defined in the project EMMP (see example in Table 1 below).

Table 1: Resulting analysis from comparing performance M&E indicator and a subset of potential environmental impacts and mitigation measures in the EMMP.

FFP Indicator Number	SPS Location and ID Number	FFP Indicator	Sub-set of information from Project EMMP	
			Environmental Impacts	Mitigation Measures
19	4.5.1.17	Kilometers of roads improved or constructed	• Localized erosion from storm-water runoff • Borrow pits used to source road aggregate material create mosquito breeding grounds	• Install appropriate road shape (in-sloped, out-sloped or crowned) and drainage structures (culvert pipes, rolling dips, canals, outlet ditches, etc.) based upon local topography, soil conditions and rainfall patterns. • Backfill all borrow pits and perform small scale landscaping to restore natural drainage patterns.
47	3.1.8.1.2	Number of people gaining access to an improved drinking water source	• Groundwater contamination causes human health problems	• Develop a Water Quality Assurance Plan in compliance with USAID and WHO standards. • Conduct periodic testing for all water points associated with the program.

This exercise will identify the minimum environmental and climate change technical criteria (as defined in the Project EMMP) to be integrated into environmentally-sensitive IPTT indicators. These technical criteria are often specific to the local context of each food assistance project, and must be met.

As per the forthcoming FFP M&E Guidance, this contextualization of IPTT indicators can be carried out by inserting "text...into the FFP or Mission PIRS using a different font or a different color, to clearly separate it from the standard text, and the amended PIRS should be submitted for approval." This contextualization does not constitute a "change" to the indicator, but simply adds more information to clarify the environmental sensitive aspects of the indicator and inform the design of the data collection tools.

Awardees should add the following statement to the Performance Indicator Reference Sheets (PIRS) of all environmentally-sensitive IPTT indicators: "The activity must meet minimum climate risk and environmental impact technical criteria as in the project-specific Environmental Mitigation and Monitoring Plan (EMMP) approved by USAID" (See Table 2).

Table 2: Performance Indicator Reference Sheet for FFP Indicator 19 with incorporated language on environmental and climate sensitivities.

19. INDICATOR: Kilometers of roads improved or constructed (RiA)	
APPLICABLE FOR ALL PROJECTS CONSTRUCTING OR IMPROVING ROADS	
DEFINITION: A road opens up transport from rural spaces where rural-based production activities such as agriculture are taking place, and connects, either directly or indirectly, with population centers and market activity. A road "improvement" indicates that the FFP intervention significantly improved the ease of commercial transport along that road, while "constructed" refers to a new road. In general, a road need not necessarily be paved with cement or asphalt but should significantly facilitate the transport of goods compared to the previous situation without the road or without the road improvement. Please only count those roads improved or constructed during the reporting year. The activity must meet minimum climate risk and environmental impact technical criteria as in the project-specific Environmental Mitigation and Monitoring Plan (EMMP) approved by USAID.	
RATIONALE: The linkage of rural communities to markets is considered a crucial means of increasing agricultural and other rural-based production as well as the access of rural communities to food at reasonable prices as well as greater off-farm employment opportunities and access to health and nutrition services.	
UNIT: Kilometers	DISAGGREGATE BY: Construction type: Improved, Constructed (new)
TYPE (OUTPUT/OUTCOME/IMPACT): Output	DIRECTION OF CHANGE: Higher is better
DATA SOURCE: FFP awardees (see "Measurement Notes").	
FOREIGN ASSISTANCE STANDARDIZED PROGRAM STRUCTURE (SPS): 4.5.1 (17)	
MEASUREMENT NOTES: • LEVEL OF COLLECTION? Project-level; only those roads constructed with FFP assistance. • WHO COLLECTS DATA FOR THIS INDICATOR? FFP awardees. • HOW SHOULD IT BE COLLECTED? Direct measurement, project records. • FREQUENCY OF COLLECTION? Annually reported.	
FURTHER GUIDANCE: · Feed the Future Handbook of Indicator Definitions: http://feedthefuture.gov/resource/feed-future- handbook-indicator-definitions.	

For more information and detailed guidance on the incorporation of environmental considerations into development food assistance project Log Frames and M&E systems, please consult the following PowerPoint and short guidance note located under the Session 9 presentation on the USAID Food Aid and Nutrition Technical Assistance (FANTA) project website.

Condition 5: Review and update environmental safeguards budget

Upon receiving BEO approval of the Project IEE, awardees should review project budgets to ensure appropriate levels of resources have been committed to all components required to implement the environmental safeguards plan and all actions detailed in the Project IEE and EMMP. Calculating the costs required to implement all environmental compliance tasks will necessitate greater review in the first year of implementation than in subsequent years because gathering information about planned environmental compliance occurs for the first time. Particular costs to look for in this step are additional assessments, staffing, field visits, and equipment and supplies. There should be consistency between the EMMP, the Detailed Budget, and the Budget Narrative.

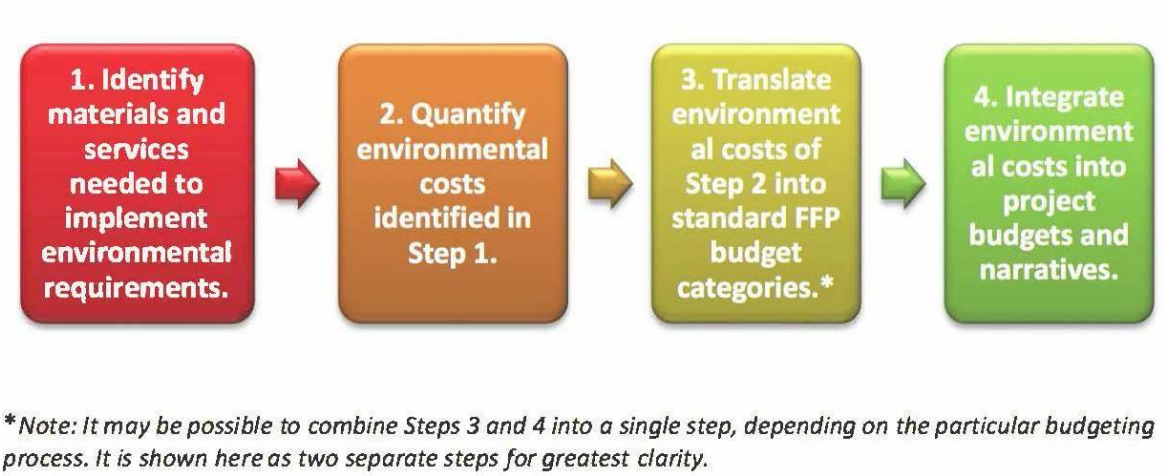

Figure 2: Developing Project Budgets for Environmental Compliance Requirements.
Source: Environmental Compliance Budgeting Toolkit, p. 5.

In subsequent years, awardees will need to consider environmental compliance and management costs in the annual Pipeline and Resource Estimate Proposal (PREP) submissions. Partners are required to submit the ESR (see Condition 7) as an attachment to their annual PREP submission. If the ESR identifies any unforeseen circumstances that affected the partner's ability to effectively mitigate environmental impacts of its activities, and/or recommends any changes to the program IEE (IEE amendment) or EMMP, the detailed and comprehensive budgets and budget narrative submitted in the PREP should describe how the program plans to account for these changes. Any changes should be well justified. As mentioned in Condition 2, the Environmental Compliance Budgeting Toolkit is a useful resource to assist awardees to effectively and iteratively incorporate environmental compliance costs into detailed and comprehensive budgets. **Condition 6: Plan for a Pesticide Evaluation Report and Safe Use Action Plan (PERSUAP)**

6A. Commodity Fumigation Mitigation Requirements

USAID requires that the person/people carrying out commodity fumigation operations hold official certification to perform the fumigation, use fumigants according to the directions on the product label, and follow all listed directions, precautions, and restrictions. Fumigants will be used only for commodities and at sites specified by the product label. To minimize the need for fumigation, all warehouses must be kept clean and food stacks on pallets must be kept at least 3.5 feet away from the walls. Stacks must be checked on a weekly basis and action taken immediately if any infestation is detected. Warehouse staff should be trained to minimize pest infestations, and stock levels must be minimized such that if infestation occurs, the magnitude of the problem is reduced.

USAID has developed an assessment of environmental and health risks in the fumigation of food aid commodity entitled USAID Programmatic Environmental Assessment (PEA) for Phosphine Fumigation of Stored Agricultural Commodity. The PEA includes *a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP) template,* and a *Fumigation Management Plan (FMP)* template. These tools are intended to assist in compliance with the Fumigation PEA's requirement for completion of a project-specific PERSUAP and FMP reporting. The Fumigation PERSUAP should be developed as soon as the warehouse and fumigation service providers are identified, and in advance of the need for fumigation. It is preferred that this PERSUAP be submitted with the Project IEE, if possible.

The following are specific mitigation requirements for the fumigant phosphine:

- *Fumigation monitoring equipment:*

  Awardees must procure and install phosphine gas monitoring devices at all commodity warehouses where fumigation will take place. Abundant evidence demonstrates that gas monitoring devices are critical to verify that phosphine concentrations are sustained at high enough levels to provide an effective "kill" treatment of the commodities. Equally, gas monitors are needed to ensure the safety of warehouse personnel and fumigators. Without these monitors, the fumigant applicator has absolutely no knowledge of the gas concentrations. See Annex T-3 of the Fumigation PEA's Supplemental Information Annex for detailed specifications on available phosphine gas monitoring equipment.

- *Gas impermeable tarps and warehouse sealing:*

  Commodity stacks in warehouses must be enclosed with plastic or tarps when fumigating with phosphine. Warehouse doors and vents, must be sealed during fumigation because gaps can result in unsafe gas leakages. In addition, fumigation tarps must be regularly checked for holes or tears, maintained and stored out of the direct reach of sunlight. In addition, the warehouse compound must remain closed during fumigation, in order to prevent human exposure to unsafe levels of gas in adjacent warehouses, office buildings, and others working in the immediate vicinity of the site. Placarding and other measures should be taken to ensure that entry to warehouses will not occur during fumigation and until gas concentrations are reduced to safe levels. For the technical specifications of appropriate gas impermeable tarps recommended for use in warehouse fumigation, as well as guidance on best practice warehouse sealing procedures, see Annex T-4 of the Fumigation PEA's Supplemental Information Annex.

- *Personal Protective Equipment (PPE) requirement:*

  PPE requirements for fumigation include half-face respirators with eye protective gear or full-face respirators, gloves, coveralls and closed-toed shoes with socks. If and when this fumigation equipment is not available, then FFP projects are prohibited from contracting with these Fumigation Service Providers. Alternatively, projects may make a proposal to their FFP AOR to procure only essential fumigation equipment as described above. See Annex T-3 of the Fumigation PEA's Supplemental Information Annex for detailed specifications on the types of PPE required for commodity fumigation.

TOPS Warehouse Safety Guide in Alignment with the USAID Fumigation PEA:

Please note that TOPS has released their Warehouse Staff Safety Guide (November, 2014) which is an excellent resource to assist awardees in the design of education campaigns for warehouse commodity storage. The Warehouse Safety Guide posters, which highlight best fumigation practices, are in compliance with the findings of the Fumigation PEA, and compliment the PEA with practical guidance, information, recommendations and tools to promote warehouse staff safety and prevent injury and illness. The materials include an 80-page manual, 7 Warehouse Staff Safety Posters, a 2-day Facilitator's Training Tool, and various other tools and checklists to help organizations adhere to minimum safety standards in the warehouse. The Guide was funded by USAID through a TOPS Program Micro-grant, and was developed by Project Concern International (PCI) and the TOPS Commodity Management Task Force.

6B. PERSUAPs for other pesticide use (e.g. agriculture, livestock, public health, construction)

Please note that pursuant to 22 CFR 216.3(b), in the event that any project activities include the promotion, procurement, transport, storage or disposal of pesticides for agricultural or livestock activities, vector control interventions, or construction material treatment, a PERSUAP for proposed pesticides must be approved by the DCHA/BEO prior to the commencement of these activities. PERSUAPs should be submitted with Project IEEs (or as amendments to Project IEEs).

Tiering off of Existing Mission PERSUAPs: As soon as activities in which the procurement or promotion of pesticides are anticipated, it is recommended that awardees contact their Mission Environmental Officer (MEO) to inquire whether an existing PERSUAP has been developed in the country or region that provides the requisite approval and guidance for the use of a particular pesticide or series of pesticides. FFP encourages its awardees to tier off existing USAID analyses when possible, thereby reducing the need to carry out new and potentially redundant analyses, yet allowing for the appropriate consideration of the specific needs and context of each development food assistance project.

For example, when USAID Mission-level PERSUAPs exist, they must be applied to the FFP program through the development of a project Safe Use Action Plan (SUAP). The SUAP provides a succinct, definitive stand-alone statement of compliance requirements, synthesized from the 12-factor analysis. It also assigns responsibilities and timelines for implementation of these requirements. As a reference,

please see the Uganda PERSUAP and project-specific SUAP. For more information on USAID environmental compliance policy requirements related to pesticides, and PERSUAPs, see this Special Topic Presentation.

Condition 7: Monitor and report on USAID environmental compliance

Environmental Status Report (ESR): Environmental Status Reports (ESRs) must be completed by all FFP awardees on an annual basis and submitted to USAID as an annex of the PREP. The primary three purposes of the ESR are to:

A. Describe how the awardee has met 22 CFR 216 environmental compliance regulations and integrated climate change resilience considerations in to programming as per Executive Order 13677;
B. Detail the necessary management structure (resource needs, staffing, logistical considerations etc.) relevant to the implementation of the awardee's climate and environmental compliance activities for the upcoming year; and
C. Discuss the effectiveness of the implementation of the program Environmental Mitigation and Monitoring Plan (EMMP) and any adaptive management strategies recommended to improve project environmental management strategies/systems.

The Environmental Status Report (ESR) Guidance (Annex 4) provides instruction to awardees on what information must be included in the ESR. The project's first ESR would likely discuss environmental staffing, budgeting, and inclusion of environmental considerations in the various assessments and surveys that take place during Year 1. The following ESRs would then have shorter updates on those same topics, but focus more specifically on reporting on EMMP implementation and monitoring.

EMMP Checklists for Field Monitoring: EMMP checklists can be useful tools to assist implementing partner staff in the integration of environmental management issues in the planning, design and activity implementation and monitoring phases. EMMP checklists can be designed for rapid environmental diagnostic exercises, which aim to identify site-specific environmental conditions that may lend to the generation of localized impacts. This analysis can be used to determine the most appropriate environmental management strategies on a site-specific basis. For monitoring purposes, checklists can also be designed to facilitate the data collection and monitoring of EMMP indicators.

One such example of site field monitoring tool are the GEMS Visual Field Guides, which are intended to support field monitoring of select activities by development professionals, including those who are not environmental specialists. They are photo-based, simple yes-no checklists that identify the most typical, significant environmental design and management considerations by development sector.

Another example of an environmental monitoring checklist system is the Go Green Strategy (GGS). This scorecard system provides environmental management information in a simple Yes/No checklist, which can be used as a monthly monitoring tool by field agents. This GGS fact sheet can be accessed on the GEMS Site. USAID conducted a more detailed assessment of the GGS through a field assessment, as described in the "Examination of Environmental Foundations for Program Design Environmental Compliance Review and Go Green Strategy Snapshot".

Annual Results Reports (ARRs): Awardees are required to submit an ARR for each FY during which project activities were implemented, regardless of when funding or food aid commodities were provided. An ARR describes the performance results of award activities implemented during the reporting FY. The ARR should include the results of environmental and climate change specific and sensitive indicators that have been incorporated into the project IPTT. Any additional information on environmental monitoring reports, assessments, action plans, and/or case studies related to the integration of environmental safeguards and climate change considerations can also be described in the ARR. Please see the FFP ARR Guidance for more information.

USAID Environmental Compliance Site Visits: As required by ADS 204.5.4, the AOR, in consultation with FFP projects, FFP Managers, Mission Environmental Officers (MEO) and/or the DCHA/BEO will actively monitor and evaluate whether environmental consequences unforeseen under activities covered by this current RFA IEE, and the Project IEEs, arise during implementation and modify or end activities as appropriate.

IEE Amendments: In the event that any new proposed activity differs substantially from the type or nature of activities described in a project's IEE, or requires different or additional mitigation measures beyond those described in the Project IEE, an IEE Amendment (IEE-A) will be developed, including a revised EMMP. Some of the possible triggers for an IEE-A include, but are not limited to: cost extension, time extension, change in target beneficiaries, and change in geographic targeting.

All amendments, are developed by projects, sent to FFP and reviewed for approval by the DCHA/BEO prior to activity implementation. EMMP revisions during the course of implementation, such as fine tuning mitigation measures or including additional analysis for unexpected impacts, are encouraged as part of any project's sound adaptive environmental management. It is important to note, such EMMP modifications do not require an IEE amendment, to be approved by USAID. However, all EMMP changes and their rationale should be reported in subsequent ESRs.

Condition 8: Ensure compliance of FFP projects with partner country regulations

Implementation will in all cases adhere to applicable partner country environmental laws. The Project IEE supports and strengthens the rule of law for systems of environmental governance in partner countries. In order to ensure environmental compliance, the status and applicability of the partner country's policies, programs, and procedures in addressing natural resources, the environment, food security, and other related issues must be incorporated into each project. This may include incorporating the national policies pertaining to environmental assessment and development or other policies related to the sector. Implementing partners must be aware of and ensure compliance to the country's regulations where their project is located.

Approved IEEs from the same geographic areas may provide valuable guidance and be a beneficial resource for cross-checking information and developing a deeper knowledge of country-specific, relevant regulations and policies. These IEEs are available on the Environmental Compliance Database.

ANNEX 1: TEMPLATE FOR PROJECT INITIAL ENVIRONMENTAL EXAMINATION

*****PRIOR TO SUBMISSION TO USAID, DELETE TEMPLATE EXPLANATORY TEXT IN YELLOW HIGHLIGHT*****

Note: In addition to the sub-set of requirements highlighted in the annotated IEE template below, all of the conditions identified in the current RFA-level IEE must also be met.

FFP ENVIRONMENTAL COMPLIANCE FACESHEET for the [INSERT PROJECT NAME] INITIAL ENVIRONMENTAL EXAMINATION

<table>
<tr><td colspan="3">Activity/Project Title:</td></tr>
<tr><td colspan="3">Contract/Award Name(s) &Number(s) (if known):</td></tr>
<tr><td colspan="3">Geographic Location (Country(ies)/ Region/Global:</td></tr>
<tr><td colspan="3">Operating Unit(s): DCHA Food for Peace</td></tr>
<tr><td rowspan="3">☐ Amendment
☐ Supplemental IEE</td><td colspan="2">DCN and date of Office-Level IEE:</td></tr>
<tr><td colspan="2">Link:</td></tr>
<tr><td colspan="2">Amendment No.: N/A</td></tr>
<tr><td colspan="2">Annual Funding Amount: $</td><td>Life of Project Amount:</td></tr>
<tr><td colspan="3">Implementation Start/End:</td></tr>
<tr><td colspan="2">IEE Prepared By:</td><td>Date Prepared:</td></tr>
<tr><td colspan="3">Implementing Partner(s):</td></tr>
<tr><td colspan="2">Recommended Threshold Determination:
☐ Categorical Exclusion
☐ Negative Determination ☐ With Conditions</td><td>☐ Positive Determination
☐ Deferral</td></tr>
</table>

SUMMARY OF FINDINGS:

Brief description of the purpose of the activity.

The purpose of this Food for Peace (FFP) Initial Environmental Examination is to analyze and document the [INSERT PROJECT NAME AND AWARDEE] environmental safeguard and compliance requirements, as described in section IV of the FFP FY16 RFA.

ENVIRONMENTAL THRESHOLD RECOMMENDATIONS:

Brief description of the 22 CFR 216 Environmental Threshold (i.e., Categorical Exclusion, Negative Determination, etc.) recommended by the IEE for Bureau Environmental Officer decision.

APPROVAL OF ENVIRONMENTAL ACTIONS RECOMMENDED:

A. Mission Clearances

Mission Director _____ Date: _____

Mission Environment Officer (MEO) _____ Date: _____

Food for Peace Officer _____ Date: _____

Regional Environmental Officer (REO) _____ Date: _____

B. Food for Peace, Washington Clearances

Agreement Officer's
Representative (AOR) _____ Date: _____

Agreement Officer (AO)/Director _____ Date: _____

C. Concurrence

Bureau Environment Officer, DCHA _____ Date: _____
Erika Clesceri

☐ Approved
☐ Not Approved

CC: Relevant Regional BEOs[3]

[3] Found at https://www.usaid.gov/node/35406#beo.

1.0 BACKGROUND AND ACTIVITY DESCRIPTION

1.1 Purpose and Scope of Project IEE

What does the IEE cover, why is it needed, is it an amendment, and if so, why?

Note: Integration of Climate Change Considerations

As specified herein, FFP IEEs must specifically address climate change considerations. This is consistent with sound impact assessment, the integration of climate change impacts in decision-making, and USAID compliance with Executive Order 13677 "Climate-Resilient International Development."

Climate change considerations are integrated throughout the IEE, not in a separate climate change section. Generally, information presented in the IEE should be based on a previous risk assessment or application of USAID's climate-resilient development framework. There is limited need for additional climate change analysis. As in impact assessment generally, the necessary level of detail for climate change information and analysis is commensurate with the climate risks presented by the activities.

1.2 Background

Describe why the project is desired and appropriate, and provide some relevant information about the context in which the project operates.

1.3 Description of Activities

Outline and briefly describe all key activities of the development food assistance project. An up-to-date activity description should be provided.

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION

2.1 Locations Affected

This section should briefly assess the current bio-physical and socioeconomic environment that might be affected by the project. Depending upon the activities proposed, this could include an examination of land use, geology, topography, soil, climate, groundwater resources, surface water resources, terrestrial communities, aquatic communities, environmentally sensitive areas (e.g. wetlands or protected species), agricultural cropping patterns and practices, infrastructure and transport services, air quality, demography (including population trends/projections), cultural resources, and the social and economic characteristics of the target communities.

The information obtained through this process should serve as an environmental baseline for future environmental monitoring and evaluation. Be selective in the information provided in this section, as it should be specific and relevant to the proposed activities and geographic regions where the project will operate.

***Where specific activity sites are known**, site-specific information (usually including annexed maps and photos) must be provided. Site specific information should serve as an environmental baseline for future environmental monitoring and evaluation.*

***Where specific sites are not known** and for more general information, this section should draw on the USAID Country Development and Cooperation Strategy (CDCS) and supportive analyses such as the Environmental Threats and Opportunities Assessment or FAA 118/119 Assessment, Conflict Vulnerability Assessment, etc.*

***Address climate change.** The section must describe reasonably expected changes in relevant baseline conditions due to climate change.*

2.2 National Environmental Policies and Procedures

In this section, summarize partner country environmental, health and safety laws, environmental impact assessment procedures, as well as land tenure, regulations and policies relevant to the proposed activities.

3.0 EVALUATION OF ACTIVITY/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

This section of the project IEE is intended to define all potential environmental impacts of the activities or program components, whether they are considered direct, indirect, beneficial, undesired, short-term, long-term or cumulative. Be clear and concise in the organization of this section.

In relation to climate change, it is important to consider how the activities may cause potential adverse impacts on local resilience/vulnerability[4] in the context of climate change (e.g. an irrigation project may place additional stress on local water resources already expected to diminish due to climate change).

Additionally, this section should discuss the potential adverse impacts of changing baseline conditions on activity outcomes or sustainability (i.e. the vulnerability of the proposed activities to reasonably anticipated climate changes).

4.0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

This section of the IEE establishes overall implementation procedures intended to ensure systematic compliance

[4] *Vulnerability is the degree to which something can be harmed by or cope with stressors such as those caused by climate change. It is a function of:*

- *Exposure: the extent to which something is subject to a stressor.*
- *Sensitivity: the extent to which something will change if it is exposed to a stressor.*
- *Adaptive capacity: the combination of the strengths, attributes, and resources available to an individual, community, society, or organization that can be used to prepare for and undertake actions to reduce adverse impacts, moderate harm, or exploit beneficial opportunities.*

with the IEE during activity implementation.

4.1 Recommended IEE Determinations

For each proposed activity or major program component recommend whether a specific intervention included in the activity should receive a Categorical Exclusion, Negative Determination (with conditions), Positive Determination, as well as cite which sections of Reg. 216 support the requested determinations (see examples above). Presenting the determinations in a table is beneficial for clarity.

The sample table below provides a format for which awardees may collect the recommended determinations for project activities:

Activity or programmatic component	***Recommended Determination***
Nutrition education	*Categorical exclusion, per 22 CFR 216.2(2)(c)(2)(viii)*
Installation of small-scale potable water infrastructure	*Negative Determination, subject to the conditions that (specify conditions, using "will," "must" or "shall") per 22 CFR 216.3(a)(2)(iii)*
Significant road construction within or proximal to protected areas	*Positive Determination, per 22 CFR 216.3(a)(2)(iii)*
Community asset construction via Food for Work in which technical approach, scope or geographic context not yet defined in sufficient detail to determine impact potential	*Deferral per 216.3(a)(7)(iv)*

4.2 Mitigation, Monitoring and Evaluation

Recommend what is to be done to avoid, minimize, eliminate or compensate for environmental impacts. For activities where there are expected environmental consequences, appropriate environmental monitoring and impact indicators should be incorporated in the activity's monitoring and evaluation plan.

Development of EMMP. *Awardees must include an Environmental Mitigation and Monitoring Plan (EMMP) as an annex to this Project IEE, for all activities that have been recommended for Negative Determination with Conditions in section 4.1.*

ANNEX 2: TEMPLATE FOR ENVIRONMENTAL MITIGATION AND MONITORING PLAN (EMMP)

The following two template tables are required of all projects as an annex to the project IEE.[5]

Activity/Impact/Mitigation Table 1			
Project Type	Activity	Description of Impact	Prescribed mitigation measures

Environmental Monitoring and Evaluation Report Table 2									
Prescribed Mitigation Measure	Responsible Party for Mitigation Measure Implementation	Monitoring Methods			Estimated Cost	Results			Recommended Adjustments
		Indicators	Methods	Frequency		Dates Monitored	Problems Encountered	Mitigation Effectiveness	

[5] For more general guidance on EMMPs, see the *Mitigation, Monitoring & Reporting* section on the GEMS Site.

ANNEX 3: TEMPLATE TO DOCUMENT ACTIVITY-LEVEL CLIMATE RISK MANAGEMENT

Tasks/Defined or Illustrative Interventions	**Climate Risks** List all climate risks related to the defined/illustrative interventions identified in the screening and additional analysis	**Risk Rating** Low/ Moderate/ High	**How Risks Addressed/Accepted** Describe how climate risks have been addressed in activity design and/or additional steps that will be taken in implementation. If you chose to accept the risk, briefly explain why.	**Opportunities to Strengthen Climate Resilience (optional)** Describe any opportunities to achieve multiple development objectives by integrating climate resilience measures

ANNEX 4: GUIDANCE FOR FFP ENVIRONMENTAL STATUS REPORTS (ESR)

U.S. Agency for International Development
Bureau for Democracy, Conflict, and Humanitarian Assistance
Office of Food for Peace
Environmental Status Report (ESR) Guidance
(Updated June 2016)

I. Background and Purpose

The Environmental Status Report (ESR) describes the resource needs to implement all environmental safeguard and climate integration tasks and activities during the upcoming implementation year of a development food assistance project. The ESR is submitted as part of the annual Pipeline and Resource Estimate Proposal (PREP), and must be approved prior to the disbursement of funds for the upcoming implementation year.

The resource needs for environmental compliance and climate integration tasks and activities must be reflected in the PREP detailed and comprehensive budgets, budget narrative and be explained in detail in the ESR. The ESR should explain and justify any changes in environmental compliance requirements that are scheduled or expected during the upcoming implementation year.

In addition, as with the PREP for the overall project, the ESR assists FFP to understand whether or not the food assistance project is "making adequate progress towards achieving" environmental safeguards and climate integration components as detailed in the RFA Initial Environmental Examination (IEE), Project IEE and Environmental Mitigation and Monitoring Plan (EMMP).

Approval of the ESR is dependent upon the satisfactory completion of each component listed below and detailed in Section IV, **ESR Components**, of this guidance.

1. Introduction
2. Environmental Compliance in the Upcoming Implementation Year
    - A. Staffing and Expertise
    - B. Budgeting
3. Progress Toward Achieving Environmental Compliance
    - A. Previous conditions from IEE or ESR
    - B. EMMP Reporting
    - C. Integration into Performance M&E
    - D. Executive Order 13677
    - E. Fumigation PEA
    - F. Lessons Learned

II. ESR Submission

The ESR will be submitted directly to the AOR and be uploaded into the Food for Peace Management Information System (FFPMIS). The ESR must be approved prior to the PREP approval, unless justification is made otherwise. Review and clearance of the ESR is conducted by the USAID Mission or Regional

Office, Mission Environmental Officer (MEO), USAID Agreement Officer's Representative (AOR), and Bureau Environmental Officer (BEO) for the Bureau for Democracy, Conflict and Humanitarian Assistance (DCHA). The BEO may provide an Environmental Threshold Decision (ETD) for the ESR outlining any BEO conditions, which would require response from the awardee within at least 30 days.

III. ESR Format

The ESR Narrative should be no less than 5 pages and should follow the same formatting specifications as the PREP (See PREP Guidance). The ESR annexes should include Table 2 of the EMMP and can include relevant photos, compressed for web-viewing. For submission, awardees must fill out and append the ESR Facesheet (see Attachment 1) to the front of the ESR.

IV. ESR Components

In the development of the ESR, awardees should follow the guidance and questions posed below under each of the ESR component sections. **NOTE:** THE INFORMATION HIGHLIGHTED IN YELLOW SHOULD BE DELETED PRIOR TO ESR SUBMISSION.

1. Introduction

Provide a "brief synopsis" of progress towards achieving environmental compliance and climate integration objectives as detailed in the RFA IEE, Project IEE and EMMP.

Awardees whose programs are making only limited progress towards achieving environmental compliance and climate integration objectives should provide an explanation, including a description of the operating environment, the extenuating circumstances that are impeding progress, and specific ways that the awardee plans to address these obstacles in the upcoming year and in the program out-years.

2. Environmental Compliance in the Upcoming Implementation Year

This section must include responses to Topics 1-4:

A. Staffing and Expertise:

- *Topic 1: Describe the upcoming implementation year's staffing plan for implementation of environmental safeguards. This will include detail on responsibilities, level of effort, management structure, etc. for staff and/or external consultants involved in managing, monitoring, and reporting on environmental safeguards and mitigation activities.*

- *Topic 2: Please describe any environmental or climate change analyses, assessments, trainings or workshops that will be carried out in the upcoming implementation year (e.g. EA, PERSUAP, FMP, climate vulnerability assessment, community resource mapping exercise, staff training on EMMP monitoring, etc.).*

B. Budgeting:

- *Topic 3: Explain how the PREP detailed and comprehensive budget incorporates environmental compliance resources. Is the request for these resources discussed in the budget narrative? Awardees should note that the costs for environmental mitigation measures must be included in each implementation year budget. Per 22 CFR 216, if no line items specific to environmental mitigation measures exist, awardees must reflect how such costs are incorporated into each applicable program element being implemented by the food assistance program.*

- *Topic 4: Provide the upcoming implementation year's budget for environmental compliance and climate integration (e.g., for staff time, trainings of warehouse staff in fumigation safety, consultants for Environmental Assessment, water quality testing, incentive awards at the community-level), as described in the PREP detailed and comprehensive budgets, and/or budget narrative. See the USAID Environmental Compliance Budgeting Toolkit for more information.*

3. Progress Toward Achieving Environmental Compliance:

This section must include responses for Topics 5-12:

A. Previous Conditions from IEE or ESR:

- *Topic 5: Describe any and all previous BEO conditions from the Environmental Threshold Decision (ETD) for the original IEE, previous year's ESR or other environmental compliance assessments or documentation (PERSUAP, EA, etc.). A specific discussion must be included for each condition. Were there any challenges in meeting these conditions? What progress has been made to meet these conditions? What is the current status of the activities addressed by these conditions?*

B. EMMP Reporting:

- *Topic 6: Attach Table 2 of the EMMP as an annex to the ESR, and in this section, discuss and summarize the principal results of EMMP monitoring, including any changes to the EMMP that the awardee has found necessary to improve program environmental management. Provide justification for any EMMP changes.*

- *Topic 7: Provide a succinct update on progress regarding the implementation and monitoring of the EMMP. Include description of the EMMP implementation and monitoring system, any updates to the system, any staff or beneficiary trainings conducted on environmental compliance, photos of mitigation measures and activities, etc.*

- *Topic 8: Describe how the project involved beneficiary community-members in the environmental mitigation approach (e.g., any social and behavioral approaches at the community level.*

C. Integration into Performance M&E:

- *Topic 9: Indicate how the awardee has integrated environmental and climate change considerations into the M&E Plan, as described in Condition 4 of the RFA-IEE and during the project M&E Workshop. Specifically, describe how the approved project EMMP was utilized in the design of the M&E Plan and summarize progress and processes in place for monitoring environmentally sensitive and specific indicators.* ***Details of the results of the indicators should only be discussed in the Annual Results Reports.***

D. Executive Order 13677:

- *Topic 10: Describe how the awardee has sufficiently integrated climate screening and sensitivity into all relevant activities. As per the US Presidential Executive Order 13677 on Climate Resilient International Development, FFP-funded activities must reflect an increased sensitivity to climate vulnerability and resilience in the geographic areas where they operate.*

E. Fumigation PEA:

- *Topic 11: Provide a description of how awardee is meeting the requirements of the USAID Programmatic Environmental Assessment (PEA) for Phosphine Fumigation of Stored Agricultural Commodity, by attaching the most recent Fumigation Management Plan (FMP). If no FMP has been completed, provide justification and timetable for completion.*

F. Lessons Learned/Innovation:

- *Topic 12: Discuss any other lessons learned and/or innovation regarding the implementation of systems for climate and environmental resilience and compliance. The awardee is asked to share with USAID any examples to institutionalize climate and environmental safeguards into the awardee project management systems (e.g. field-based environmental monitoring systems, community-level social and behavioral change tools/strategies, community incentive awards, etc.).*

Remember, if the PREP submission, including the ESR, is submitted to FFP/Washington only and not to FFP/Mission as well, the overall PREP approval process and thus authorization of resources for the upcoming fiscal year will be delayed. FFP/Mission must clear the ESR prior to the DCHA/BEO.

Attachment 1: Facesheet for Food for Peace Environmental Status Report
USAID / [Insert Mission or Operating Unit Name]

Activity/Project Title:		
Contract/Award Name(s) &Number(s) (if known):		
Geographic Location (Country(ies)/ Region/Global		
Operating Unit(s): DCHA Food for Peace		
ESR Year:	**IEE Number:**	
IEE Link:		
Amount of Dollar Funding Requested in the PREP: $		
Amount of Commodity: $	**Life of Award (LOA): $**	
Project Start and End Dates:		
ESR Prepared By:	**Date Prepared**:	
Implementing Partner(s):	**Reporting due dates (if any):**	
Recommended Threshold Determination: ☐ Categorical Exclusion ☐ Negative Determination ☐ With Conditions	☐ Positive Determination ☐ Deferral	

USAID APPROVAL OF ENVIRONMENTAL ACTION(S):

Food for Peace, Mission (or Regional Office, as appropriate*):

Food for Peace Officer* _____Date: _____

Mission Environmental Officer* _____Date: _____

Food for Peace, Washington:

Agreement Officer's Representative _____ Date: _____

DCHA Bureau Environmental Officer _____Date: _____

Regional Environmental Officer** _____ Date: _____

** FFP/M/R environmental officer clearance is mandatory; clearance by the FFP/M/R FFP officer is optional.*
***REO clearance is optional.*